

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Assessment Against)	
the Public Utilities in the State of)	
Missouri for the Expenses of the)	Case No. AO-2004-0610
Commission for the Fiscal Year)	
Commencing July 1, 2004.)	

MISSOURI GAS ENERGY'S APPLICATION TO INTERVENE

COMES NOW Missouri Gas Energy, a division of Southern Union Company, by and through counsel, and pursuant to 4 CSR 240-2.075, respectfully moves to intervene in the above-captioned proceeding in which Missouri-American Water Company seeks rehearing of the Missouri Public Service Commission's June 24, 2004, *Assessment Order for Fiscal Year 2005* (the "Assessment Order"). In support of its Application to Intervene, MGE states as follows:

1. Southern Union Company is a corporation duly incorporated under the laws of the state of Delaware and conducts business in Missouri under the fictitious name of Missouri Gas Energy ("MGE"). MGE is a "gas corporation" and a "public utility" as those terms are defined in RSMo. §386.020, with its principal office located at 3420 Broadway, Kansas City, Missouri, 64111.

2. As a public utility, MGE is subject to the annual utility assessment order issued by the Commission pursuant to RSMo. §386.370. Because MGE pays a share of the assessment, MGE has an interest in this case.

3. Because no assessment case for the 2005 fiscal year existed prior to June 24, 2004, and because of the short time between the issuance of the Assessment Order and its effective date, MGE has had only a limited opportunity to review the Commission's Assessment Order and the information posted on the Commission's website.

4. MGE generally concurs with the allegations contained in Missouri-American Water Company's Application for Rehearing filed herein, but there may be issues of concern other than

those stated therein, and MGE is unsure of the precise position it will take in this case. MGE desires an opportunity to discuss the assessment process with the appropriate parties.

5. As a public utility subject to the Commission's assessment, MGE's interest in this case differs from that of the general public, and MGE has an interest that may be directly affected by the outcome of this proceeding. Further, MGE may not be adequately represented by other parties to this proceeding, and its intervention and participation in this proceeding will be in the public interest.

WHEREFORE, for the reasons stated herein, Missouri Gas Energy, a division of Southern Union Company, respectfully requests that the Commission issue an order permitting MGE to intervene in this case with full rights as a party hereto.

Respectfully submitted,

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ATTORNEYS FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered, mailed by U.S. mail, or electronically transmitted on this 16th day of July, 2004, to all parties of record.

_____/s/ Diana C. Farr